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UNIFIED SCHOOL DISTRICT, BARBARA
WILSON AND PERCY MCGEE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

TIM GALLI,

Plaintiff,

vs.

PITTSBURG UNIFIED SCHOOL
DISTRICT, BARBARA WILSON AND
PERCY MCGEE,

Defendant.

CASE NO. 3:09-cv-03775-JSW

**JOINT STIPULATION AND ~~(PROPOSED)~~
ORDER CONTINUING DEPOSITION
AND DISPOSITIVE MOTION
DEADLINES**

Trial Date: July 25, 2011

**SUBJECT TO THE APPROVAL OF THIS COURT, THE PARTIES HEREBY
STIPULATE TO THE FOLLOWING:**

WHEREAS, the parties reached a tentative settlement agreement, pending approval of the
Pittsburg Unified School District's ("District") Board of Trustees ("Board"), at the settlement
conference before United States Magistrate Judge Bernard Zimmerman on Thursday, February 10,
2011 ; and

WHEREAS, the District's Board will consider the settlement agreement at its regularly
scheduled meeting on March 9, 2011; and

WHEREAS, the parties do not wish to incur further attorneys fees and costs associated
with this matter, including but not limited to completing current discovery and drafting dispositive

1 motions, prior to the Board's consideration of the settlement agreement on March 9, 2011.

2 NOW THEREFORE, THE PARTIES HEREBY STIPULATE to continue the deadline to
3 complete all currently noticed depositions to March 16, 2011; and

4 THE PARTIES FURTHER STIPULATE to continue the deadline to file dispositive
5 motions to April 1, 2011; and

6 THE PARTIES FURTHER STIPULATE to continue the hearing on all dispositive
7 motions to May 13, 2011
8 motions to ~~May 6, 2011~~; and

9 THE PARTIES FURTHER STIPULATE that all other scheduled dates shall remain the
10 same.

11 **SO STIPULATED.**

12 DATED: February 15, 2011

Respectfully submitted,

13 FAGEN FRIEDMAN & FULFROST, LLP

14 By: /s/ Roy A. Combs

Roy A. Combs

15 Attorneys for Defendants PITTSBURG UNIFIED
16 SCHOOL DISTRICT, BARBARA WILSON
17 AND PERCY MCGEE

18 DATED: February 15, 2011

Respectfully submitted,

19 THE VENARDI LAW FIRM

20 By: /s/ Mark L. Venardi

21 Mark L. Venardi

22 Attorneys for Plaintiff TIM GALLI
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~~PROPOSED~~ ORDER

IT IS HEREBY ORDERED, pursuant to the above Stipulation of the parties, that the deadline to complete all depositions, both expert depositions and non-expert depositions, be continued to March 16, 2011.

IT IS FURTHER ORDERED, pursuant to the above Stipulation of the parties, that the deadline to file dispositive motions be continued to April 1, 2011; and

IT IS FURTHER ORDERED, pursuant to the above Stipulation of the parties, that the hearing on all dispositive motions be continued to ~~May 6, 2011~~ May 13, 2011 at 9:00 a.m.

DATED: February 15, 2011


Hon. Jeffrey S. White
UNITED STATES DISTRICT JUDGE

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